

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

JUDY HUNTER, et al.,

Plaintiffs,

vs.

BERKSHIRE HATHAWAY INC.,

Defendant.

**No. 4:14-CV-663-Y**

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT AND RELATED RELIEF**

Plaintiffs Judy Hunter, Anita Gray, and Bobby Lynn Allen (collectively, “Plaintiffs”), pursuant to Federal Rules of Civil Procedure 23(a) and 23(b)(1) and (2), move the Court to preliminarily approve their Class Action Settlement Agreement (“Settlement”) with Defendant Berkshire Hathaway Inc. (“Defendant” or “Berkshire”); set a final fairness hearing and related deadlines; approve a form of Class Notice; preliminarily certify two Settlement Classes and appoint Plaintiffs as Class Representatives; and appoint Keller Rohrback L.L.P. as Class Counsel. In connection therewith Plaintiffs further move the Court, pursuant to Federal Rule of Civil Procedure 15(a)(2) and Defendant’s written consent, to reinstate the class allegations in their Amended Complaint. An executed copy of the Class Action Settlement Agreement (“Settlement” or “Settlement Agreement”) is included as Exhibit 1 to Plaintiffs’ Appendix in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement and Related Relief (“Appendix” or “App’x”), filed concurrently

herewith. While Defendant does not oppose the relief requested in this Motion, Defendant does not agree with all averments stated in the accompanying Memorandum.

This Motion is supported by the Memorandum filed concurrently herewith, the Appendix, and by the record in this case. A proposed form of Order granting this motion is lodged herewith.

RESPECTFULLY SUBMITTED this 30th day of December, 2019.

/s/ Gary A. Gotto

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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I certify that on December 30, 2019, all counsel of record were served with a copy of the foregoing via the Court's ECF system pursuant to Local Rule 5.1(d).

/s/ Christopher Graver